

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

In re:

Gary F. Frascarelli
dba Gary's Ice Cream

Debtors

Chapter 13

Case No. 10-40810-HJB

**DEBTOR'S MOTION TO EXTEND THE DEADLINE TO FILE CHAPTER 13
PLAN, SCHEDULES I AND J AND FORM B22C**

NOW COMES the Debtor, by and through counsel, and move this Honorable Court to extend the deadline by which the Debtor must file with this Court his Chapter 13 Plan, Schedules I and J and Form B22C from March 12, 2010, through and including April 6, 2010.

In support of this Motion, the Debtor states the following:

1. On February 26, 2010 the Debtor caused to be filed with this Court his voluntary Chapter 13 Petition, Schedules and Statements.
2. The Court entered an Order to Update, which required the Debtor to file with this Court his Chapter 13 Plan, Schedules I and J and Form B22C (the "documents").
3. The documents were omitted from the original filing due to the fact that the Debtor was in need of an immediate bankruptcy filing. As a result, the Debtor was unable to gather all of the necessary information required by the documents. The Debtor and counsel are in need of additional time to verify financial information for the Form B22C and to gather the necessary information

regarding income and expenses for Schedules I and J. The information from Schedules I and J ultimately will provide the basis for the Chapter 13 Plan to be filed with the Court.

4. As a result of the foregoing, the Debtor needs additional time to file the documents with the Court.

WHEREFORE, the Debtor respectfully requests this Honorable Court to allow this Motion and to extend the deadline by which the Debtor must file with this Court his Chapter 13 Plan, Schedules I and J and Form B22C from March 12, 2010 through and including April 6, 2010 and to grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Gary F. Frascarelli
By his attorney,

Dated: March 11, 2010

/s/ Tali A. Tomsic

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CERTIFICATE OF SERVICE

I, Tali A. Tomsic, hereby certify that I have this day served the **DEBTOR'S MOTION TO EXTEND THE DEADLINE TO FILE CHAPTER 13 PLAN, SCHEDULES I AND J AND FORM B22C** by mailing a true and accurate copy of each, if not shown as being served electronically, via first class mail and postage prepaid, to the following parties in interest:

Gary F. Frascarelli
105 Carlisle Street
Chelmsford, MA 01824

Dated: March 11, 2010

/s/ Tali A. Tomsic
Tali A. Tomsic